

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS;  
RAJ LEE; MICHAEL CAMERON; MATTHEW  
SAUNDERS, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity  
as Sheriff of Oakland County; CURTIS D.  
CHILDS, in his official capacity as Commander of  
Corrective Services; OAKLAND COUNTY,  
MICHIGAN,

Defendants.

Case No. 20-cv-10949

**DECLARATION OF MICHAEL WHITE**

I, Michael White, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently detained in the Oakland County Jail while awaiting trial because I cannot afford the bond imposed in my case. My court dates keep getting postponed, so I have no idea when I will actually get to go to trial.
2. I am 58-years old and suffer from hypertension. I receive medication from the Jail for my condition.
3. I am detained in cell R5 in the holding tanks, and have been in that cell since approximately March 9. About four or five days after I came to cell R5, they put a guy in here who had previously been a kitchen trustee and who I think

was sent here as punishment for something. About a day later, that guy started to get real sick. He said he had a terrible headache, and was sniffing and sneezing a lot. After about three or four days like that (so around March 17 or so) the guards pulled him out of our cell. The next day, the guards informed us that our cell was under quarantine for 14 days. We assumed that the guy who was pulled out had COVID-19, but the guards never gave us that information. The guards never give us information about what is going on with COVID-19 in the jail. I never learned the guy's name because he wasn't here long and was really sick most of the time.

4. Being under quarantine meant that we were not allowed out of our cell for any purpose except to shower, and we were not even allowed out for that purpose very often. We would be the last holding cell to get to shower too, so that meant the showers were really dirty by the time we got there. In order to get to the showers we have to pass right by an area where guards change out before and after their shifts.
5. Because they told us we would be quarantined for 14 days, we kept track and knew when the quarantine was supposed to be over, around the end of March. At that time, we asked the guards if that meant we were back to normal. We were told that our quarantine would be extended another fourteen days.
6. During that extension of the quarantine, Jamaal Cameron was transferred into R4, the holding cell next to mine. It is possible to communicate between the two cells because they are right next to each other. They are separated by a clear sheet of plexiglass inside, but you can reach right around the front of my cell and into R4, and people hand things like food or hygiene items back and forth between the cells every day. Also, when the trustees bring us supplies like spray bottles and mops, during clean-up time, once a day, inmates hand those supplies back and forth between cell R4 and R5. The supplies are also passed to other cells in our area too without being cleaned first.
7. I told Jamaal about the fact that we were under quarantine, and about the guy who was pulled out of the cell with what we assumed to be COVID-19.
8. Our quarantine was extended one additional time and expired on or around April 24.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 5, 2020

/s/Michael White  
Michael White

\*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On May 5, 2020, I personally spoke with Michael White and read this declaration to him. Mr. White told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Philip Mayor  
Philip Mayor